

EXHIBIT G

1/14/2025

Richard Kadrey, et al. v. Meta Platforms, Inc.
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Sy Choudhury 30(b)(6)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)	
)	
Individual and)	
Representative)	
Plaintiffs,)	
)	
v.)	Case No. 3:23-cv-03417-VC
)	
META PLATFORMS, INC.,)	
)	
Defendant.)	

** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **

Videotaped Deposition of Meta
by and through its corporate designee
SY CHOUDHURY
San Francisco, California
Tuesday, January 14, 2025

Reported Stenographically by
Michael P. Hensley, RDR, CSR No. 14114

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1 THE VIDEOGRAPHER: We're at 58 minutes.

2 ATTORNEY PRITT: Should we use this one?

3 Hmm. All right. I don't have any further
4 questions.

5 ATTORNEY HARTNETT: I have a brief
6 redirect.

7 EXAMINATION

8 BY ATTORNEY HARTNETT:

9 Q. Mr. Choudhury, as a corporate
10 representative of Meta, you testified about a
11 meeting prior to your meeting that you personally
12 attended sometime during the week of April --
13 April -- or first week of April 2023; correct?

14 A. That's correct.

15 Q. And you spoke with opposing counsel about
16 considerations that were discussed in the meeting
17 prior to your meeting; correct?

18 A. Correct.

19 Q. Were there, in addition to the
20 nonprivileged reasons that you discussed today,
21 legal considerations discussed in that meeting of a
22 privileged nature?

23 A. There was.

24 ATTORNEY HARTNETT: That's all.

25 ATTORNEY PRITT: Well, then I have a

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1 re-redirect. I have two minutes.

2 EXAMINATION

3 BY ATTORNEY PRITT:

4 Q. Mr. Choudhury, you didn't mention any
5 legal considerations when I asked you what the
6 considerations were; correct?

7 A. Correct.

8 Q. And now you're saying there are and there
9 were legal considerations; correct?

10 A. They -- we did ask for legal guidance
11 in -- in both the meetings.

12 Q. Who did you ask legal guidance from?

13 A. Mo Metanat.

14 Q. And what was the subject, without getting
15 into what the actual legal guidance was, about?

16 A. Should we -- whether we should pause or
17 continue the discussions, the licensing discussions.

18 Q. Yeah. I asked was the legal advice or
19 legal -- sorry. What was the subject of the legal
20 advice that you asked for, not whether you should
21 pause or continue licensing?

22 A. That's all --

23 ATTORNEY HARTNETT: Object to the form.
24 And asked and answered.

25 THE WITNESS: That's -- that's all we

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1 discussed.

2 BY ATTORNEY PRITT:

3 Q. So it's your testimony that whether or not
4 to pause or continue licensing involves legal
5 advice?

6 A. Yes.

7 ATTORNEY PRITT: Okay. I have no further
8 questions.

9 THE VIDEOGRAPHER: Okay. Is that it?

10 ATTORNEY HARTNETT: Yes. Thank you.

11 THE VIDEOGRAPHER: Okay. This is the end
12 of Video 1 of 1 and concludes Volume Number 2 in the
13 30(b)(6) deposition of Meta Platforms, Inc., by Sy
14 Choudhury.

15 We are now off the record. The time is
16 11:56.

17 (Deposition concluded at 11:56 A.M.)

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